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6	FAX: 702.893.3789 Attorneys for Defendant		
7	State Farm Mutual Automobile Insurance Company		
8	UNITED STATES DISTRICT COURT		
9	DISTRICT OF NEVADA, SOUTHERN DIVISION		
10	***		
11	RENEE PASSADORE,	CASE NO.: 2:22-cv-02118-MMD-EJY	
12	Plaintiff,	STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES	
13	VS.	[SECOND REQUEST]	
14	STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, a Foreign		
15	Company; and DOES I through X, inclusive; and ROE ENTITIES XI through XX,		
16	inclusive,		
17	Defendants.		
18	Pursuant to LR 6-1 and LR 26-3, the parties, by and through their respective counsel of		
19	_		
20		rt extend discovery in the above-captioned case by	
21		cember 10, 2023. In addition, the parties request	
22	that all other future deadlines contemplated by the Discovery Plan and Scheduling Order be		
23	extended pursuant to Local Rule. In support of this Stipulation and Request, the parties state as		
24	follows:		
25	DISCOVERY	COMPLETED	
26	1. On January 12, 2023, the parties of	conducted an initial FRCP 26(f) conference.	
27	2. On January 30, 2023, Plaintiff served her FRCP 26 Initial Disclosures.		
28	3. On February 2, 2023, Defendant served its FRCP 26 Initial Disclosures.		

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- 4. On March 3, 2023, Defendant served its first set of Document Requests and Interrogatories.
- 5. On March 27, 2023, Plaintiff served her first set of Document Requests and Interrogatories.
- 6. On March 30, 2023, Plaintiff served her responses to the first set of Document Requests and Interrogatories.
- 7. On April 14, 2023 Plaintiff served her designation of Expert Witnesses and Reports.
- 8. On April 26, 2023, Defendant served its second set of Document Requests and Interrogatories.
- 9. On May 2, 2023, Plaintiff served her Supplemental Designation of Expert Witnesses and Reports.
- On May 2, 2023, Defendant served its first Supplement to FRCP 26 list of Witnesses and Documents.
- 11. On May 3, 2023, Defendant served its response to the first set of Document Requests and Interrogatories.
- 12. On May 5, 2023, Defendant served its second supplement to FRCP 26 list of Witnesses and Documents.
- 13. On May 17, 2023, Plaintiff served her responses to the second set of Document Requests and Interrogatories.
- 14. On May 17, 2023, Plaintiff served her Rule 26(a)(1) first Supplement to Initial Disclosures.
- 15. On May 23, 2023, Defendant served its third supplement to FRCP 26 list of Witnesses and Documents.
- 16. On May 24, 2023, Plaintiff served her second set of Interrogatories.
- 17. On May 24, 2023, Defendant served notice of Taking Deposition of Plaintiff Renee Passadore.
- 18. On June 19, 2023, Defendant deposed Plaintiff.

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19. Plaintiff disclosed medical records and bills.

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DISCOVERY REMAINING

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1. The parties will continue participating in written discovery.

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2. Plaintiff will depose State Farm representatives.

5 6 3. Plaintiff will depose Defendant's FRCP 30(b)(6) witness(es).

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4. The parties may depose any and all other witnesses garnered through discovery, potentially including treatment providers and claims adjusters.

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5. The parties will designate expert witnesses and may conduct depositions of those expert witnesses.

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6. Any and all discovery deemed necessary and permitted by the Federal Rules of Civil Procedure.

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WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

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The parties aver, pursuant to Local Rule 26-3, that good cause exists for the following requested extension. This Request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, the parties seek this extension solely for the purpose of allowing

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sufficient time to conduct discovery.

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The parties have been diligent in moving the case forward: participating in a reasonable amount of discovery, including exchanging their initial lists of witnesses and documents; propounding written discovery requests and preparing responses thereto; records procurement; and

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preparing for Plaintiff's deposition.

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State Farm is supplementing discovery responses prior to Plaintiff taking the depositions of State Farm representatives. It is anticipated that following the discovery responses plaintiff will set

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their depositions of the germane State Farm employees.

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This extension will allow the parties experts to review all transcripts before preparing reports. Furthermore, the extension provides the parties with more time to continue settlement

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negotiations.

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Further, following the deposition of Ms. Passadore, the parties discussed alternative dispute resolution and the informal exchange of settlement offers before undertaking the costs of expert reports and Defendant depositions.

Extension or Modification of The Discovery Plan and Scheduling Order. LR 26-3 governs modifications or extension of the Discovery Plan and Scheduling Order. Any stipulation or motion to extend or modify that Discovery Plan and Scheduling Order must be made no later than twenty-one (21) days before the expiration of the subject deadline and must comply fully with LR 26-3. This stipulation is made more than 21 days before the expiration of any deadlines.

This is the first request for extension of time in this matter. The parties respectfully submit that the reasons set forth above constitute compelling reasons for the short extension.

The following is a list of the current discovery deadlines and the parties' proposed extended deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	Wednesday, October 11, 2023	Sunday, December 10, 2023
Deadline to Amend Pleadings or Add Parties	Thursday, July 13, 2023	Monday, September 11, 2023
Expert Disclosure pursuant to FRCP 26 (a)(2)	Thursday, July 13, 2023	Monday, September 11, 2023
Rebuttal Expert Disclosure pursuant to FRCP. 26(a)(2)	Monday, August 14, 2023	Friday, October 13, 2023
Dispositive Motions	Thursday, November 9, 2023	Monday, January 8, 2024
Joint Pretrial Order	Thursday, December 7, 2023	January 9, 2024 January 9, 2023. If dispositive motions are pending, then the parties will serve their Joint Pretrial Order within thirty days of the Court's order as to the parties' dispositive motions.

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1	WHEREFORE, the parties respectfully request that this Court extend the discovery period		
2	by sixty (60) days from the current deadline of October 11, 2023, up to and including Sunday,		
3	December 10, 2023, and the other dates as outlined in accordance with the table above.		
4	Dated this 5 th day of July, 2023.	Dated this 5 th day of July, 2023.	
5	LEWIS BRISBOIS BISGAARD & SMITH LLP	KAPLAN YOUNG	
6 7 8 9	/s/ Frank A. Toddre ROBERT W. FREEMAN Nevada Bar No. 3062 FRANK A. TODDRE, II Nevada Bar No. 11474 6385 S. Rainbow Boulevard, Suite 600	/s/ Brittany A. Young BRITTANY A. YOUNG Nevada Bar No. 13663 KORY L. KAPLAN Nevada Bar No. 13164 10091 Park Run Drive, Suite 190	
10	Las Vegas, Nevada 89118 Attorneys for Defendant State Farm Mutual	Las Vegas, Nevada 89145 Attorneys for Plaintiff Renee Passadore	
11	Automobile Insurance Company		
12	ODDED		
13	ORDER		
14	IT IS SO ORDERED.		
15	DATED this 5th day of July, 2023.		
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17		layra J. Zouchah	
18	UI	NITED STATES MAGISTRATE JUDGE	
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